

**REMARKS/ARGUMENTS**

These Remarks and amendments are responsive to the Office action mailed November 10, 2004 (the "Office Action"). The Applicant respectfully requests reconsideration of the claim rejections for at least the reasons set forth below.

**STATUS OF THE CLAIMS**

Claims 1-34 were pending in the application at the time of the Office Action.

Claim 1 is amended to include substantive limitations of dependent claim 5 and intervening claim 2, which are canceled, and to further recite that the method includes the step of determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if so, then providing the user with the requested access to the plurality of financial accounts.

Claim 21 is amended to include substantive limitations of dependent claim 23 and intervening claim 22, which are canceled. Claim 21 has also been amended to recite the step of determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if so, then displaying a summary of the plurality of financial accounts to the user.

Claim 15 is canceled, and claim 16, which originally depended from claim 15, is amended to depend from amended claim 1.

Claims 18-20 are canceled.

New claim 35 is added to recite various features of original claims 29 and 30, which are canceled, and is rewritten to better define the invention claimed therein. New claim 35 also includes the limitation that the system is adapted to compare the amount of ownership verification information required by first and second financial accounts, determine whether the user-provided ownership verification information

satisfies the ownership verification information required by the financial account that requires the most stringent verification information; and, if so, then grant the user access to both the first financial account and the second financial account.

Claims 31-34 are amended to depend from and conform with the language of claim 35.

New claim 36 is added to depend from claim 1. Support for this claim is found in the specification at page 13, lines 4-10.

New claim 37 is added to recite the limitations of original claims 10 as rewritten in independent form. New claims 38-40 are added to depend from new claim 37, and recite the substantive features of original claims 8, 9 and 11, respectively.

New claim 41 is added to recite the limitations of original claim 26 as rewritten in independent form.

Various other amendments to the claims have been made to provide more consistent claim language and correct typographical and/or grammatical errors, and are not made in response to prior art or any failure to satisfy the conditions of patentability.

#### AMENDMENTS TO THE SPECIFICATION

Various typographical errors have been corrected in the specification. No new matter is believed to be added by these amendments.

#### CLAIM REJECTIONS UNDER 35 U.S.C. § 112 and OBJECTIONS TO THE SPECIFICATION

The Examiner rejected claim 1 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement for allegedly lacking sufficient disclosure to enable the feature of “the user being provided with direct access to each of the plurality of financial accounts.” The Examiner provided a corollary objection, under 37 C.F.R. § 1.75(d)(1), to the specification for failing to provide the proper antecedent

basis for the claimed feature of “direct access by users to each of the plurality of financial accounts.”

The rejection and objection were provoked by the Applicant’s addition of the claim language in question to claim 1 in the Applicant’s amendment dated July 14, 2004. In order advance the prosecution of the application and to streamline the issues before the Patent Office, the Applicant has deleted this claim language, thereby abrogating the rejection and objection. As such, withdrawal of the § 112 rejection and objection to the specification are respectfully requested.

CLAIM REJECTIONS UNDER 35 U.S.C. § 102(e)

*Claims 21-25 and 27-28*

Claims 21-25 and 27-28 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Starr (U.S. Pat. No. 6,606,606). The Applicant respectfully traverse and requests reconsideration of the rejection for the following reasons.

Anticipation under 35 U.S.C. § 102(e) occurs when “each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987); *see also* M.P.E.P. § 2131. The Applicant respectfully submits that Starr does not anticipate amended claim 21 because it does not disclose or reasonably suggest the claimed method steps of: “ranking the ownership verification information requirements for each of the selected financial accounts on the basis of the stringency of the ownership verification requirements for each of the selected financial accounts;” “prompting the user for user-provided ownership verification information related to the selected financial account with the most stringent ownership verification information requirements;” and “determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if so, then displaying a summary of the plurality of financial

accounts to the user.” For brevity and clarity of explanation, these elements are referred to herein as the “Ranking Step,” the “Prompting Step,” and the “Determining Step,” respectively.

As explained in the specification, the present invention provides a self-service regime for allowing a user to set up access to one or more of his or her own financial accounts. Generally speaking, the system does so by organizing the user’s accounts according to a hierarchy based on how difficult the financial institution has made it to demonstrate whether a user is the true owner of the accounts. *See*, Specification, p. 4, ll. 5-25. For example, access to credit card accounts requires a relatively high level of proof of ownership, whereas relatively little proof of ownership is required to access an auto loan account. *See id. at* p. 22, ll. 11-21; *and* p. 23, l. 21- p. 24, l. 2. The different levels of proof of ownership reflect, among other things, the degree of risk of the account falling into the hands of an impostor. For example, a person obtaining access to a credit card account can misappropriate funds, but a person having access to an auto loan can only pay off an existing debt and can not misappropriate funds. Therefore, the ownership verification information required to access the credit card account is more stringent than the information required to access an auto loan.

Using the present invention, when a user seeks to obtain access to his or her financial accounts, the system prompts the user to enter user-provided ownership verification information (the Prompting Step), such as the user’s date of birth, social security number, home phone number, mother’s maiden name, and so on. The system ranks the financial accounts according to the stringency of the information required to demonstrate ownership (the Ranking Step), and compares the user-provided information with the owner verification information requirements of the type of financial account having the most stringent verification requirements (the first part of the Determining Step). If the user’s information satisfies the most stringent verification requirements, then the system grants the user access not only to the financial account having the most stringent verification requirements, but also to all of the remaining

financial accounts (the second part of the Determining Step). This provides improved ease of use over previous systems because, by testing the user's ownership of the financial account having the most stringent requirements and granting simultaneous access to financial accounts requiring lesser degrees of proof, it eliminates the separate verification procedures that were previously required for separately signing on to all of the various financial accounts. *See* Specification, p. 6, l. 17 - p.7, l. 2. The system also allows the user to grant him or herself access to the accounts ("self-service") without having to be granted such access manually by a system administrator. *Id.*

Starr illustrates a system that provides access to various different types of financial services, such as bill payment services, payroll services, 401(k) services, and the like. *See* Starr, col. 6, ll. 12-51. However, as explained below, Starr fails to teach or reasonably suggest a method by which a user establishes his or her own access privileges using a system that ranks financial accounts based on stringency of proof of ownership, and verifies the user's ability to prove his or her ownership of the most stringent account.

The first difference between Starr and the present invention is that Starr's various types of access privileges are *not* arranged in a hierarchy based on *stringency of ownership verification requirements*. Although Starr shows users having *different* access privileges in Figure 4, these various access privileges actually reflect ministerial functions that are based on what responsibilities the users have for performing them. *See* Starr, col. 7, ll. 29-32 ("the payroll person for the company may be allowed to employ the payroll service, but may be prevented from accessing the CMA account for general check writing privileges"). Starr says *nothing at all* about ranking these privileges according to how difficult it is for a user to demonstrate true ownership of the privileges — that is, the "stringency of the owner verification requirement[s]." As such, Starr fails to disclose the claimed feature of "ranking the ownership verification information requirements for each of the selected financial accounts *on the basis of the*

*stringency of the ownership verification requirements for each of the selected financial accounts,”* as required by amended claim 1.

For the same reason, Starr also fails to disclose the feature of “prompting the user for user-provided ownership verification information related to the selected financial account *with the most stringent ownership verification information requirements.*” As explained above, Starr fails to disclose or suggest ranking various financial accounts according to the stringency of the ownership verification information requirements, and therefore it necessarily does not disclose or suggest prompting the user for information related to the account with the most stringent requirements.

Starr also fails to teach or reasonably suggest the step of “determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if so, then displaying a summary of the plurality of financial accounts to the user.” Starr discloses a privilege-granting regime in which an “access controller” determines what types of access the users can have to the system. This is described as being done by a “root user” having the capability to create sub accounts having different levels of user privileges. Starr, col. 7, ll. 21-25. An example of such a regime is shown in Starr’s Figure 4, which shows a matrix of users (shown in the left column), and the particular access privileges associated with that user. *Id.* Fig. 4. However, as explained above, Starr fails to teach or suggest *ranking* the financial accounts to determine the account *with the most stringent ownership verification information requirements*, and therefore also fails to disclose determining whether user-provided ownership verification information satisfies the most stringent requirements.

Starr also says absolutely nothing about providing a user summaries of a *plurality* of accounts if the user-provided ownership verification information satisfies the requirements of the *one* account having the most stringent proof requirements, thereby eliminating the need for multiple separate comparisons. At best, Starr shows a

system in which a system administrator gives sub users access to various parts of a system based on who is responsible for each task, *without* providing any discussion about ranking privileges according to stringency of ownership verification information requirements. As such, the Starr system appears to be a typical prior art system in which the system administrator must *separately* compare each access privilege to the sub user's job requirements, and then assign those that are necessary for that sub user's job. No ranking of any sort is shown. Such a vague disclosure is hardly sufficient to anticipate the detailed access-granting regime of the step of "determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if so, then displaying a summary of the plurality of financial accounts to the user."

The foregoing deficiencies demonstrate that Starr does not teach each and every limitation of claim 21, and therefore can not anticipate this claim under 35 U.S.C. § 102(e). These differences are not trivial. Starr's failure to disclose the aforementioned features results in it being incapable of providing a *self-service* method to grant access to accounts requiring various different amounts of information to prove ownership. Like the rest of the prior art, Starr fails to recognize the utility of using the ownership verification information regime of the present invention to provide such a self-service method, and therefore relies on a system administrator ("root user") to grant access to the users on a non-automated, case-by-case basis. As such, the Applicant respectfully requests reconsideration and allowance of amended claim 21. Furthermore, as claims 24-28 depend from claim 21, allowance of these claims is requested as well.

#### CLAIM REJECTIONS UNDER 35 U.S.C. § 103(a)

##### *Claims 1-7 and 14-20*

Claims 1-7 and 14-20 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Clark (U.S. Pat. No. 5,710,889) in view of Lee (U.S. Pat. No.

5,742,683). The Applicant respectfully traverses and requests reconsideration of the rejection for the following reasons.

To establish a *prima facie* obviousness rejection, all of the claim limitations must be taught or suggested in the prior art. See *In re Royka*, 490 F.2d 981 (C.C.P.A. 1974); and M.P.E.P. § 2143.03. In the present case, the Applicant respectfully submits that no *prima facie* case of obviousness has been established with respect to claim 1 because the prior art fails to teach or reasonably suggest the limitations of: “ranking the ownership verification information requirements for each of the plurality of financial accounts on the basis of the stringency of the ownership verification information requirements for each of the plurality of financial accounts;” “prompting the user for user-provided ownership verification information related to the financial account with the most stringent ownership verification information requirements;” or “determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if so, then providing the user with the requested access to the plurality of financial accounts.” These elements are, for the purposes of this discussion, substantially the same as those discussed above with reference to claim 21, and are also referred to herein for brevity’s sake as the “Ranking Step,” the “Prompting Step,” and the “Determining Step,” respectively.

The Clark patent describes a system for integrating access to various financial services from different geographic locations. See Clark, Abstract. Like the Starr reference described above, Clark also discloses an entitlement system: “associated with each user of the system is a set of specific entitlements stored in the [entitlements] subsystem 16 that limit the kinds of transactions and inquiries the user can make in the system against particular accounts and locations.” Clark, col. 5, ll. 16-20. Also like Starr, Clark explains that a system administrator grants access to various users. See, e.g., Clark, col. 18, ll. 58-61 (“A local system manager for the customer can control the entitlements (e.g., permissible transaction types, amounts, accessible accounts, etc.) for



each individual user or workstation at the local level.”); *and* col. 25, l. 64 - col. 26, l. 6. The Lee patent also describes a system in which users have different access privileges. *See* Lee, Abstract. However, Lee simply explains that an administrative user grants various privileges to multiple users, without describing any method or system for granting such privileges. *Id.*, col. 7, ll. 24-45.

Neither Clark nor Lee teaches or suggests the claimed feature of “ranking the ownership verification information requirements for each of the plurality of financial accounts on the basis of the stringency of the ownership verification information requirements for each of the plurality of financial accounts.” As with Starr, neither Clark nor Lee says anything at all about ranking multiple accounts based on the stringency of proof required to demonstrate ownership of the accounts. Clark simply describes different types of access, without “ranking” them at all. *See* Clark, col. 18, ll. 58-61. Lee describes that the owner of a postage meter may be set up as the administrative user that grants various levels of access to various users, but says *nothing* about these different access levels being ranked according to the stringency ownership verification information requirements of the access levels. In fact, the Lee system only describes a *single* level of access that even relates to ownership (refilling privileges) and therefore can not describe ranking “a *plurality* of financial accounts.” *See* Lee, col. 7, ll. 24-45. In view of the foregoing, the Applicant respectfully submits that the combination of Clark and Lee does not teach or reasonably suggest the feature of “*ranking* the ownership verification information requirements for each of the *plurality* of financial accounts *on the basis of the stringency of the ownership verification information requirements for each of the plurality of financial accounts.*”

Clark and Lee also fail to disclose the feature of “prompting the user for user-provided ownership verification information related to the financial account with the most stringent ownership verification information requirements.” Neither Clark nor Lee describes, anywhere, a method that prompts a user for anything other than user IDs and passwords. In both systems, the various levels of access are granted to users

without prompting such users to enter any kind of “ownership verification information” related to any financial accounts. The present specification makes it clear that the “ownership verification information” relates to proving ownership of an account, and this does not include “user identification” and “password” information, which are not sufficient to show ownership. Indeed, claim 1 clearly differentiates “user identification” and “password” from the “ownership verification information.” As such, while Lee describes users having to enter additional passwords to access additional privileges, it does not disclose entering any kind of *“prompting the user for user-provided ownership verification information* related to the financial account with the most stringent ownership verification information requirements.”<sup>1</sup> Clark and Lee also can not disclose prompting the user for information related to the account with the most stringent verification requirements, because, as explained above, neither reference teaches ranking multiple accounts to determine which has the most stringent requirements. As such, even if Lee does render it obvious to “employ the step of obtaining another piece of information from users besides the normal verification for further information accessing,” Lee is still limited to teaching that this other information is *simply another password*. Lee fails to disclose the use of ownership verification information as the additional information, and such a change would not have been obvious to a person of ordinary skill in the art, particularly within the larger context of the present claims and present invention.

Clark and Lee also do not teach or reasonably suggest the feature of “determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if so, then providing the user with the requested access to the plurality of financial accounts.” As

---

<sup>1</sup> At best, Lee simply shows multiple instances of the claimed elements of “prompting the user for a password” and “receiving the password from the user.”

explained above, neither Clark nor Lee discloses organizing multiple accounts based on stringency of verification requirements (the Ranking Step), or prompting the user for user-provided ownership verification information (the Prompting Step). Therefore Clark and Lee also can not disclose determining whether the user-provided information satisfies the most stringent ownership information, as required by the first part of the Determining Step.

Furthermore, neither Clark nor Lee teaches or reasonably suggests providing the user with access to a *plurality* of accounts if the user meets the requirements for the most stringent account, as required by the second part of the Determining Step. In fact, Clark appears to teach the opposite where it explains that the various users are preferred to each be limited to just *one* function: "each user can perform only *one* of the create, verify, and authorize functions." Clark, col. 19, ll. 24-25; *see also*, col. 20, ll. 42-45. As such, Clark fails to disclose the grant of access to multiple accounts based on providing ownership information relating to the most stringent account. Similarly, Lee simply discloses that users may have multiple levels of access based on different passwords, but does not indicate anything about being granted these levels of access as a result of *supplying ownership verification information* to satisfy the requirements of the most stringent financial account's requirements. In fact, *Lee doesn't even show multiple financial accounts*, but actually shows levels of access to a *single* account (the postage "vault"). As such, Clark and Lee also fail to teach or reasonably suggest claim 1's feature of "determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if so, then providing the user with the requested access to the plurality of financial accounts."

The foregoing deficiencies demonstrate that Clark and Lee fail to teach each and every limitation of claim 21, and therefore can not render this claim obvious under 35 U.S.C. § 103(a). As such, the Applicant respectfully requests reconsideration and

allowance of amended claim 1. Furthermore, as claims 3-4, 6-14, and 16-17 depend from amended claim 1, allowance of these claims is requested for the same reasons.

#### Claims 8-9

Claims 8-9 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Clark, in view of Lee, and further in view of Starr. Claims 8-9 depend from amended claim 1. As explained above in relation to slightly different language of amended claim 21, Starr fails to teach or reasonably suggest the recitations in claim 1 of: “ranking the ownership verification information requirements for each of the plurality of financial accounts on the basis of the stringency of the ownership verification information requirements for each of the plurality of financial accounts;” “prompting the user for user-provided ownership verification information related to the financial account with the most stringent ownership verification information requirements;” or “determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if so, then providing the user with the requested access to the plurality of financial accounts.” As such, the combination of Starr with Clark and Lee still fails to teach or reasonably suggest these features of amended claim 1. Therefore, for the reasons explained in detail above, the Applicant respectfully submits that the combination fails to render claims 8 and 9 obvious under 35 U.S.C. § 103(a). Withdrawal of this rejection is respectfully requested.

#### Claims 10-13

Claims 10-13 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Clark, in view of Lee, and further in view of Moy (U.S. Pat. No. 5,425,102). Claims 10 and 11 depend from amended claim 1. The Applicant respectfully traverses and requests reconsideration for the following reasons.

Claims 10 and 11 recite method steps in which a user actually creates his or her own answers to challenge questions, which are *completely separate from the password*.

Claim 10 recites the step of “prompting the user to *create original answers* to challenge questions.” Claim 11 recites the steps of: “presenting one or more of the challenge questions to the user,” “receiving the *user’s answers* to the one or more challenge questions,” and “providing the user with the requested access if the *user’s answers* to the one or more challenge questions match the original answers.” The answers to the challenge questions are *separate* from the user’s actual password, and the user can access the system by properly answering the challenge questions, *even if the user does not remember the password*. See Specification, p. 27, l. 27 - p. 28, l. 9.

Claims 12 and 13 are substantially different from claims 10 and 11. Claims 12 and 13 recite a system in which the user creates “cue questions.” The cue questions are logically related to the password itself, and if a user can not remember his or her password, the method presents the cue questions to the user to help the user remember the password. See Specification, p. 26, ll. 7-15. If the user can not remember his password even after being presented with the cue questions, then the present invention may initiate the challenge question system recited in claims 10 and 11. *Id.* at p. 25, ll. 13-15.

Moy, on the other hand, illustrates a system in which a user is given *hints* to the user’s *password*, but does not teach or reasonably suggest a method in which the user creates answers to challenge questions that can be used to gain access to the system *independently* of the password. In Moy, the user defines the hints, which are intended to spark the user’s memory to recall *the original password*. See Moy, col. 5, ll. 10-24. For example, if the password includes the name of the user’s pet turtle, the hints direct the user to recall the name of the turtle, which is tantamount to remembering the password. *Id.* In all cases, Moy simply describes giving the user hints to remember the *password itself*. If the user ultimately can not remember the password even after receiving all the hints, the user is denied access to the Moy system. *Id.*, col. 4, ll. 48-55. At best, Moy describes a system akin to the “cue question” method recited in claims 12 and 13. However, it is clear that the Moy system utterly fails to disclose the

establishment of user-defined answers to challenge questions as required by claims 10 and 11.

In view of the foregoing distinctions between Moy and the invention of claims 10 and 11, the Applicant respectfully submits that Moy fails to teach or reasonably suggest the claims features of "prompting the user to *create original answers* to challenge questions," as required by claims 10, and "presenting one or more of the challenge questions to the user," "receiving the *user's answers* to the one or more challenge questions," and "providing the user with the requested access if the *user's answers* to the one or more challenge questions match the original answers," as required by claim 11. Therefore, there is no *prima facie* case of obviousness under 36 U.S.C. § 103(a), and the Applicant respectfully requests reconsideration and allowance of claims 10 and 11.

Furthermore, because claims 10-13 depend from claim 1, the Applicant also requests reconsideration or the rejection of these claims on the grounds stated above with respect to the failure of Clark and Lee, even when combined with Moy, to teach all of the limitations of independent claim 1.

#### Claim 26

Claim 26 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Starr in view of Moy. The Applicant respectfully traverses and requests reconsideration for the following reasons.

Claim 26 depends from amended claim 21 and recites the further step of "allowing the user to perform the steps of creating the user identification and password in more than one session."

In support of the rejection, the Examiner states that:

Starr fails to disclose the step of prompting the user to create original answers to challenge questions and the step of prompting the user to create cue questions that providing [sic] the user with a cue as to the user's password.

Moy discloses a computer security apparatus simplified [sic] the administration of passwords by providing [the] user with password hints if the user fails to recall the password.

Office Action, p. 10.

The Examiner's basis for rejecting claim 26 *does not address the limitations recited in the claim*. Namely, the Examiner's basis for rejecting the claims is that Moy teaches password features not found in Starr, but the claim limitations relate to *allowing the user to create the user identification and password in more than one session*. As such, the Examiner has not identified the limitations of the claim in the prior art, and has not provided any substantive argument for rejecting claim 26, and reconsideration and withdrawal of the rejection of claim 26 is respectfully requested. Furthermore, as claim 26 depends from amended claim 21, allowance for the reasons set forth with respect to the rejection of claim 21 under 35 U.S.C. § 102(e) is also requested.

**Claims 29-34 / New Claim 35**

Claims 29-34 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Starr in view of Lee. As noted above, claims 29 and 30 are cancelled and replaced by new claim 35. As such, the rejection of claims 29-34 will be addressed herein with respect to the limitations of new claim 35. The Applicant respectfully traverses and requests reconsideration for the following reasons.

New claim 35 recites a system for controlling access to financial accounts in which at least one network server is adapted to: "receive a request from the user to access at least one of two or more financial accounts;" "receive a user identification and password from the user;" and "receive user-provided ownership verification information from the user related to at least one of the two or more financial accounts." The system further includes first and second financial systems that maintain first and second financial accounts, respectively, and each of the financial accounts has ownership verification information requirements. The system also has an application server that is adapted to compare the amount of ownership verification information

required for the first and second accounts, and determine which requires the most stringent ownership verification information. The application server is also set up to determine whether the user-provided ownership verification information satisfies the ownership verification information required by the financial account that requires the most stringent verification information, and, if so, then grant the user access to both the first financial account and the second financial account.

Numerous features of new claim 35 are not found in the prior art of record. For example, the prior art does not teach or reasonably suggest a system that can “compare the first amount of ownership verification information with the second amount of ownership verification information to determine which of the first financial account and second financial account requires the most stringent ownership verification information.” As explained in greater detail above with respect to the rejection of claim 21, Starr fails to disclose or suggest a system that ranks multiple financial accounts based on the stringency of the ownership verification information required to prove that the person accessing the system is the true owner of the accounts. Moy fails to cure this deficiency.

Furthermore, Starr and Moy fail to disclose a system that can “determine whether the user-provided ownership verification information satisfies the ownership verification information required by the financial account that requires the most stringent verification information; and, if so, then grant the user access to both the first financial account and the second financial account.” In addition to failing to disclose ranking the accounts to determine which has the most stringent verification information requirements, Starr and Moy both fail to disclose a system that grants access to *multiple* financial accounts based upon demonstrating ownership of only one of the accounts.

The foregoing deficiencies in the prior art would still exist even if Starr and Moy were combined with Clark and Lee.

In view of the foregoing deficiencies in the prior art, the Applicant respectfully submits that there is no *prima facie* case of obviousness against new claim 35, and thus



request allowance thereof. In addition, because claims 31 to 34 have been amended to depend from new claim 35, these claims are also believed to be allowable for the same reasons.

**New Claim 36**

New claim 36 depends from amended claim 1, and recites the further step of “determining whether the user-provided ownership verification information satisfies the ownership verification information requirements of the financial account with the most stringent ownership verification information requirements, and, if not, then providing the user with access to only the financial accounts of the plurality of financial accounts having ownership verification information requirements that are satisfied by the user-provided ownership verification information.” This feature, which is described in the present specification at page 13, lines 4-10, provides a convenient system by which a user, even if he or she fails to provide ownership information sufficient to satisfy the requirements of the financial account with the most stringent proof requirements, is still granted access to the accounts for which the user-provided ownership verification information is sufficient to satisfy the proof requirements. This limitation is not present in any of the prior art of record, and therefore allowance of new claim 36 is respectfully requested.

**New Claims 37-40**

New claim 37 recites essentially the subject matter of original claim 10, as rewritten in independent form, and new claims 38, 39 and 40 recite essentially the same subject matter of original claims 8, 9 and 11, respectively. As explained previously herein with respect to the 35 U.S.C. § 103(a) rejection of claims 10-13, the subject matter of original claim 10 is not rendered obvious by the combination of Clark, Lee and Moy. More specifically, the combined references fail to teach or reasonably suggest a method having the step of “prompting the user to *create original answers* to challenge questions,” as required in original claim 10, and new claim 37. As explained above, the answers to the challenge questions are *separate* from the password, and can be used to

access the system, even if the user can not remember the original password. In contrast, Moy simply discloses using a hint system in which the user selects hints that are intended to direct the user to remember the original password. The combined references also fail to disclose the additional features of: "presenting one or more of the challenge questions to the user," "receiving the *user's answers* to the one or more challenge questions," and "providing the user with the requested access if the *user's answers* to the one or more challenge questions match the original answers," as recited in original claim 11 and new claim 40.

As such, new claims 37 and 40 recite features not found in the combined prior art, and allowance of these claims is respectfully requested. The Applicant also requests allowance of claims 38-39, which depend from claim 37, for the same reasons.

#### New Claim 41

New claim 41 recites the subject matter of original claim 26 as rewritten in independent form. As explained above, original claim 26 was rejected under 35 U.S.C. § 103(a) under a combination of Starr and Moy. However, the stated basis for the rejection did not address the limitations of original claim 26, and therefore no *prima facie* case of obviousness exists for this rejection. As such, the Applicant respectfully requests allowance of this claims for the same reasons set forth with respect to the 35 U.S.C. § 103(a) rejection of original claim 26.

#### CONCLUSION


The Applicant respectfully submits that the application is in condition for allowance, and notification thereof is respectfully requested. If the Examiner believes that prosecution might be advanced by discussing the application with the Applicant's counsel, in person or over the telephone, the Applicant's counsel would welcome the opportunity to do so.

A Request for Continued Examination and the appropriate filing fees are submitted herewith. However, in the event the provided payment is insufficient or in

excess, the Commissioner is hereby authorized to charge or credit the undersigned's  
Deposit Account No. 50-0206 to correct any payment error.

Respectfully submitted,

HUNTON & WILLIAMS LLP

By:   
Michael P.F. Phelps  
Registration No. 48,654

Hunton & Williams LLP  
1900 K Street, N.W., Suite 1200  
Washington, D.C. 20006-1109  
Direct Dial (703) 714-7472  
Main Telephone (202) 955-1500  
Facsimile (202) 778-2201

Dated: April 5, 2005